

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Peter St. Laurent

Plaintiff

v.

Civil Action No. 04-11951-NG

UNITED PARCEL SERVICE, INC.

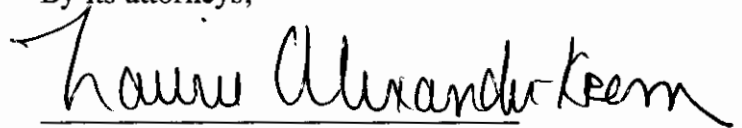
Defendant

**MOTION OF UNITED PARCEL SERVICE INC. FOR
SUMMARY JUDGMENT ON ALL CLAIMS**

Pursuant to Fed. R. Civ. P. 56, United Parcel Service Inc. ("UPS"), moves for summary judgment on all claims against it (Counts I of the Plaintiff's Complaint). There are no material facts in dispute and UPS is entitled to judgment as a matter of law. Accordingly, UPS respectfully requests that the Court enter summary judgment in its favor. In support of its Motion for Summary Judgment, UPS refers the Court to its Memorandum in Support of UPS' Motion for Summary Judgment, UPS' Separate Statement of Undisputed Facts, UPS' Record Materials in Support of its Motion for Summary Judgment, and the Affidavit of Neal Rossi in Support of United Parcel Service Inc.'s Motion for Summary Judgment.

United Parcel Service Inc.

By its attorneys,



Hugh F. Murray, III, BBO# 557175

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Certificate of Service

I hereby certify that on this day
a true copy of the above document
was served upon the attorney of
record for each party by mail/by hand.

Date: 5/31/05

Date: May 31, 2005